#### Oil and Natural Gas Roundtable

Tuesday, February 27<sup>th</sup> and Wednesday, February 28<sup>th</sup> 2018 U.S. EPA Region 8 | 1595 Wynkoop Street| Denver, Colorado 80202

#### Cosponsors:

U.S. Environmental Protection Agency Environmental Council of the States Interstate Oil and Gas Compact Commission

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## **Background Materials**

#### Welcome

Thank you for agreeing to participate in the oil and natural gas roundtable. Oil and natural gas plays a key role in the United States' clean energy future. Responsible development of America's shale gas resources offers important economic, energy security, and environmental benefits. In order to achieve these benefits efficiently, effective stakeholder engagement is essential. The oil and natural gas roundtable is an opportunity for stakeholders to come together and discuss challenges and meaningful solutions.

#### Overview

In July 2017, Administrator Pruitt committed the U.S. Environmental Protection Agency (EPA) to holding a roundtable with the oil and natural gas industry as well as other stakeholders, including state regulators, NGOs, and others "...to discuss industry concerns and enhance communication while ensuring safe and responsible domestic oil and gas production." EPA partnered with the Environmental Council of States (ECOS) and the Interstate Oil and Gas Compact Commission (IOGCC) to host the oil and natural gas roundtable.

The purpose of the roundtable is for a small number of oil and natural gas stakeholders to come together and share their individual expertise and experiences and work together to find reasonable and practical solutions related to various environmental regulatory, permitting, and compliance challenges with the goal of achieving more effective and efficient environmental outcomes. Therefore, the oil and natural gas roundtable objectives are:

- 1. To improve relationships and enhance communications among oil and natural gas stakeholders.
- 2. To identify and share solutions related to challenges that adversely impact efficient and timely compliance.

Following the roundtable, EPA will produce a document capturing various individual stakeholder ideas, experiences, and practices. The document may serve as the basis for further discussions at both the ECOS Spring Meeting in St. Paul, MN (March 20-22, 2018) and the IOGCC Business Meeting in Oklahoma, City, OK (May 6-8, 2018).

#### Logistics

The oil and natural gas roundtable will be held at EPA's Regional Office in Denver, Colorado in the EPA Region 8 Conference Center, which is located on the second floor of the building.

Prior to your arrival in Denver or visiting EPA Region 8, please visit the following webpage (<a href="https://www.epa.gov/aboutepa/visiting-epas-region-8-office-denver">https://www.epa.gov/aboutepa/visiting-epas-region-8-office-denver</a>) to familiarize yourself with EPA Region 8's security and screening procedures. In addition to these procedures, you will also find

information on driving directions and parking resources for local participants as well as other pertinent visitor information.

To assist you with the security and screening process:

- You will proceed through security and screening on both days of the roundtable and anytime you leave the building and re-enter.
- While there are vending machines for snacks and cold beverages in the building, there is not an
  option for coffee or tea. You are welcome to bring your coffee or tea with you through security
  and screening.
- The roundtable starts at 8:30 a.m. on both Tuesday, February 27 and Wednesday, February 28. You may enter the building as early as 7:00 am.
- Once you complete the security and screening process, you will proceed to the conference center on the second floor for registration.
- All participants will be assigned seats.

#### **Participant Preparation**

Participants are asked to prepare by:

- Reviewing the roundtable materials, including the draft final agenda and two case studies.
- Contemplating your individual challenges and meaningful solutions so that you can succinctly share an example at the roundtable.

#### **Facilitator**

The roundtable discussions will be facilitated by Arleen O'Donnell, Vice President, Eastern Research Group (ERG), a contractor to EPA. Arleen has been working to protect and sustainably manage water resources since beginning her career as a researcher at the Woods Hole Oceanographic Institution. During her 18 years at the Massachusetts Department of Environmental Protection—where she rose to the position of Commissioner—she spearheaded innovative water resources management and air pollution control programs and regulations working closely with industry, agriculture and other members of the regulated community. She has held national leadership positions with the ECOS and the Association of Clean Water Administrators.

Since 2008, Arleen has stayed involved with ECOS and has supported the Shale Gas Caucus. She leads ERG's natural resource management practice, and supports the EPA, the U.S. Army Corps of Engineers, National Weather Service and other state and local government clients. An experienced stakeholder engagement facilitator, Arleen specializes in collaborative problem solving.

Arleen holds a B.S. in biology and environmental science from the University of Massachusetts and an M.S. in civil engineering and urban/environmental policy from Tufts University.

#### Frequently Asked Questions

1. Who is attending the oil and natural gas roundtable?

A mix of approximately 70 representatives from state regulatory agencies, tribes, industry, trade associations, environmental NGOs, and EPA. An attendee list will be provided.

2. How was my organization selected to participate?

ECOS and IOGCC identified prospective participants, and EPA issued invitations to prospective participants.

3. Is the roundtable open to the public or the media?

No, participation is by invitation only. However, EPA intends to release publicly a summary of the proceedings of the roundtable.

4. Are the roundtable discussions for attribution?

Consistent with Chatham House Rule, EPA's summary will not quote individuals or attribute statements to a specific organization. Chatham House Rule states: "When a meeting, or part thereof, is held under the Chatham House Rule, participants are free to use the information received, but neither the identity nor the affiliation of the speaker(s), nor that of any other participant, may be revealed." If necessary, EPA's summary may generically attribute a sentiment to a stakeholder category, like "a representative from a state suggested..." or "an industry representative stated..."

5. As a participant, will I be able to review and comment on a draft version of EPA's written summary of the roundtable prior to its release?

Yes, EPA will provide all participants with a draft version of its summary by email for review for a short period of time. EPA requests that participants submit prospective edits/comments on an individual basis. EPA will work with ECOS and IOGCC to finalize the roundtable summary.

6. What is the purpose of releasing a summary of the roundtable proceedings?

Broadly, to offer oil and natural gas stakeholders additional perspectives and opportunities for engagement on specific challenges. More specifically, the summary of the roundtable proceedings may serve as the basis for further discussions at the ECOS Spring Meeting in St. Paul, MN (March 20-22, 2018) and the IOGCC Business Meeting in Oklahoma, City, OK (May 6-8, 2018).

7. Will EPA offer additional oil and natural gas roundtables in the future?

At this time, EPA is not planning an additional oil and natural gas roundtable. However, following the

January 2018 roundtable, ECOS and IOGCC plan to continue and build on the roundtable discussions at the ECOS Spring Meeting and the IOGCC Business Meeting.

8. Why did EPA partner with ECOS and IOGCC on the oil and natural gas roundtable?

EPA commonly partners with states through organizations like ECOS and IOGCC to ensure cooperative approaches to protecting human health and the environment.

9. What is the Environmental Council of the States (ECOS)?

ECOS is the national nonpartisan, nonprofit organization of state and territorial environmental agency leaders. ECOS' purpose is to improve the capability of state environmental agencies to protect and improve human health and the environment.

10. What is the Interstate Oil and Gas Compact Commission (IOGCC)?

IOGCC is the organization of the oil and natural gas producing states, with the responsibility to protect and develop the states' oil and gas resources, avoid waste of those resources, and protect the environment.

### **Draft-Final Agenda**

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#### Roundtable Objectives:

- (1) To improve relationships and enhance communications among oil and natural gas stakeholders.
- (2) To identify and share solutions related to challenges that adversely impact efficient and timely compliance.

	Agenda for Tuesday, February 27, 2018
8:00-8:30 am	Registration
8:30-9:00	Welcome
	Doug Benevento, Regional Administrator
	U.S. Environmental Protection Agency Region 8
	Opening Remarks
	Kenneth E. Wagner, Senior Advisor to the Administrator for Regional and State Affairs
	U.S. Environmental Protection Agency
	Martha E. Rudolph, Co-Chair
	Shale Gas Caucus
	Environmental Council of States
	and Director of Environmental Programs
	Colorado Department of Public Health and Environment
	Matthew J. Lepore, Vice Chairman
	Interstate Oil and Gas Compact Commission
	and Director of Colorado Oil and Gas Conservation Commission
	Department of Natural Resources
9:00-9:20	Orientation and Participant Introductions
	Arleen O'Donnell, ERG
9:20-9:45	Case Study One – Moving through Challenges, Finding Opportunities TBD
9:45-10:30	Session 1: Identification of Challenges that Prevent Cost-Effective and Timely Compliance Roundtable Discussion
	In this session, we will build from information submitted in the roundtable worksheets and
	discuss specific challenges that prevent cost-effective and timely compliance. Participants will share their individual ideas or experiences.
10:30-10:45	Break
10:45-11:45	Session 1: Identification of Challenges that Prevent Cost-Effective and Timely Compliance
	Roundtable Discussion

11:45-1:00	Lunch
1:00-1:15 pm	Reconvene - Assignment for Break-out Groups Arleen O'Donnell, ERG
1:15-2:45 pm	Session 2: Identifying Meaningful Solutions to Improve Cost-Effective and Timely Compliance
	Roundtable Discussion
	In this session, roundtable participants will break into smaller groups and identify meaningful solutions pertaining to respective topic areas. Participants will share their individual ideas or experiences.
	Topic Area 1: Regulation and Policy
	Discussion leader: David Glatt, Co-Chair
	Shale Gas Caucus
	Environmental Council of States
	and Chief of the Environmental Health Section  North Dakota Department of Health
	Not at Dakota Department of Hearth
	<u>Topic Area 2: Permitting</u> Discussion leader: Richard Simmers, Second Vice Chair, IOGCC and Chief, Division of Oil and Gas Resource Management Ohio Department of Natural Resources
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	<u>Topic Area 3: Compliance Assurance</u> Discussion Leader: Patrick Traylor, Deputy Assistant Administrator
	Office of Enforcement and Compliance Assurance
	U.S. Environmental Protection Agency
2:45-3:00	Break
3:00-4:45	Session 3: A Menu of Solutions
	Roundtable Discussion
	In this session, roundtable participants will come back together and each discussion leader will share some of the meaningful solutions identified for various challenges.
4:45-5:00	Recap and Transition to Day Two Arleen O'Donnell, ERG
5:00 pm	Adjourn
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	Agenda for Wednesday, February 28, 2018
8:30-9:00 am	Case Study Two – Moving through Challenges, Finding Opportunities TBD
9:00-9:10	Session 1: U.S. Environmental Protection Agency Smart Sectors Program Daisy Letendre, Senior Advisor for Policy and Strategic Communications and Smart Sectors Program Team Lead Office of Policy
9:10-9:40	Session 2: Recap and Reactions Roundtable Discussion
	During this session, we will recap key findings from the previous day. Participants will then have the opportunity to share any strategic insights related to the previous days' key findings.
9:40-10:25	Session 3: U.S. Environmental Protection Agency Air, Water and Compliance Assurance Perspectives
	Clint Woods, Deputy Assistant Administrator Office of Air and Radiation
	Dennis Lee Forsgren, Jr., Deputy Assistant Administrator Office of Water
	Patrick Traylor, Deputy Assistant Administrtaor
	Office of Enforcement and Compliance Assurance
10:25-10:35	Break
10:35-11:15	Session 4: The Path Forward  Martha E. Rudolph and David Glatt, representing the Environmental Council of States Shale Gas Caucus and Matthew J. Lepore, representing the Interstate Oil and Gas Compant Commission will discuss with roundtable participants how to further the roundtable efforts at upcoming ECOS and IOGCC meetings.
11:15-11:30	Recap of Day Two Arleen O'Donnell, ERG

11:30-12:00	Closing Panel Remarks
	Anne L. Idsal, Regional Administrator
	U.S. Environmental Protection Agency Region 6
	Todd Parfitt, President
	Environmental Council of States
	Wyoming Department of Environmental Quality Director
	Mike Smith, Executive Director
	Interstate Oil and Gas Compact Commission
12:00 pm	Adjourn

### Case Studies

Topic: Need for a Class II Injection Well Program in the State of Idaho.

#### Background:

The need to administer and permit Class II wells is relatively recent, dating back to 2010, when oil and gas development increased in Southwest Idaho. Economical water disposal methods are vital to the health of an oil and gas industry in any producing state. Idaho does not have a Class II Injection Well program. This forces producers to seek other methods, including water treatment and evaporation ponds. These alternative methods have increased the cost of water disposal resulting in operators reducing overall production.

In 2010, the Idaho Department of Water Resources (IDWR) began working with the Environmental Protection Agency (EPA) to revise its UIC primacy to update the Class V injection well program and add a Class II Injection Well program.

From 2010 to 2015, IDWR worked with the public, the Idaho Water Resource Board, the EPA, and the Idaho Legislature to update its administrative rules, governing statutes, and policy to support a primacy revision package to the EPA. After submission, several deficiencies were found in the primacy revision package that needed to be addressed.

In 2017, the oil and gas industry's need for injection wells and an approved Class II program intensified. In response, IDWR and the Idaho Department of Lands (IDL) participated in a series of coordination meetings with the EPA and oil and gas industry representatives.

At a coordination meeting in June of 2017, three different options were identified for proceeding to resolve administration of a Class II program in Idaho and issue a permit. The option identified with the shortest timeline was for the EPA to administer the program and issue permits out of its Region 10 office. The EPA estimated that it could obtain the necessary legal authority to administer a Class II program in Idaho in less than a year, should Idaho formally request that action.

#### **Proposed Solution:**

- IDWR needed a solution that would provide a permitting mechanism in the short term. The
  decision was made to ask the EPA to oversee the Class II Injection program. This decision was
  based on many factors, some of which are:
  - The EPA has an permitting process that has been proven successful in other states.
  - Operators in Idaho also have operations in other states where Class II wells are permitted through the EPA. This means operators are familiar with the EPA process.
  - The small number of Class II wells that may be permitted in Idaho at this time would not be cost effective for the state of Idaho to justify the additional resources needed to effectively regulate the program. Therefore, transferring the program to a regional EPA office appears to be the most cost-effective approach in the near term.

#### For more information, contact:

Mick Thomas

Oil & Gas Division Administrator

#### CASE STUDY: RANGE RESOURCES NEW OWNER POLICY SELF DISCLOSURE<sup>1</sup>

#### I. Acquisition

In September 2016, Range completed acquisition of new assets in the Terryville Field of Louisiana, adding more than 220,000 acres to Range's portfolio.

#### II. Initial Assessment of Acquired Facilities

- a. Following Range's acquisition of the assets in northern Louisiana, the Environmental Compliance department began assessing compliance with all environmental laws and regulations at the facilities.
- b. Range brought in outside counsel—Pillsbury Winthrop Shaw Pittman LLP—to help assess compliance and develop a strategy for addressing any noncompliance.
- c. Evaluated the key regulations potentially applicable:
  - i. Which sites are subject to 40 C.F.R. Part 60, Subpart OOOO or OOOOa?
  - ii. Which facilities, if any, are major source/Title V sources?
- d. Identified highest producing sites, developed emissions factors, performed modeling.
- e. Compiled an accurate well site and equipment inventory, including dates of well drilling and equipment installation for over 390 individual facilities.

#### **III.** Addressing Noncompliance

- a. Based on initial calculations, Range believed that noncompliance at its newly-acquired facilities was fairly widespread, and set out to identify specific noncompliance using more accurate information based on actual sampling and modeling (the inherited data and regulatory determinations were believed to be unreliable)
- b. Range had to decide how to best correct the noncompliance taking into account enforcement exposure and operational needs to continue production.

#### IV. Weighing Whether to Self-Disclose

- a. Range had to decide whether to disclose the violations to the state and/or EPA, or whether to try and correct the violations before disclosing them. Range concluded that it would be better to disclose the violations before corrective action at all 390 facilities could be completed, since corrective action itself, without appropriate approval may constitute a violation (e.g. installation of a control device requires an ATC)
- b. Range decided that the best course was to voluntarily self-disclose the potential noncompliance to the state, given that the state did not have its own new owner policy or audit policy. Accordingly, Range committed to conducting an audit of all of the newly-acquired facilities under EPA's New Owner Audit Policy.
- c. The New Owner Audit Policy provided flexibility for a company such as Range that acquired facilities to reach an agreement with EPA within nine months from the date of the transaction. It offered substantial penalty mitigation in exchange for any self-disclosed violations and planned corrective action.
- d. The primary considerations (1) maintaining control over operations and process while correcting violations and (2) reducing penalty and enforcement exposure.

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<sup>&</sup>lt;sup>1</sup> This case study summary is provided only for discussion purposes by Matthew Morrison of Pillsbury Winthrop Shaw Pittman, counsel to Range Resources Corporation. The views and statements herein should not be attributed to Range Resources. Any questions or comments can be directed to Mr. Morrison at matthew.morrison@pillsburylaw.com.

#### V. Examples of Challenges and Issues with the Audit Policy

- a. <u>Uncertain Application</u> Application of the New Owner Policy is not automatic just because you bought new facilities; EPA has full discretion whether to apply the Policy. This made us nervous and vulnerable to penalties and enforcement action if EPA rejected our request.
- b. <u>Default to a Short Corrective Action Window</u> The default corrective action period is 60 days from the discovery of the violation unless EPA grants you an extension. Although extensions are not generally given up front; you can submit a proposed corrective action schedule and hope that it is accepted. Again, if not accepted, you remain potentially subject to enforcement. EPA has a track record of providing reasonable extensions, but there are no guarantees. Range was given three years to complete six phases of its audit for all 390 acquired facilities.
- c. No Model Agreement EPA had no model New Owner Audit Agreement, and virtually no precedent for this situation, therefore, a new agreement had to be developed. Moreover, we did it by an exchange of letters, rather than a signed document, which raised some question on whether there was a true agreement just by the exchange of different terms.

#### VI. Facility Auditing and Corrective Action

- a. Range contracted a third-party environmental consultant to assist with ensuring that each well site was properly permitted and that control equipment was installed, designed, and sized appropriately where necessary. The consultants are also conducting regulatory applicability determinations for all of the potentially applicable regulations to oil and gas production.
- b. Range is auditing and completing corrective action at hundreds of sites and is taking various parts of each audit separately. After completing each segment/component of the audit, Range submits a report to EPA and the state summarizing the audit activities, violations discovered, and corrective action completed to EPA.
- c. Range has to also produce semi-annual status updates to EPA, which are also provided to the state.
- d. This process requires careful coordination with the state (the permitting authority), so flexibility for state agency terms should be built into the audit agreement.

#### VII. Conclusion: Wise Choice with Overall Satisfaction

- a. Range is still conducting its comprehensive audit, but it has already proven a very wise choice. It has established our relationship with state and federal regulators in a very positive way, and we have successfully managed the compliance and enforcement risks we faced in acquiring the NLA assets.
- b. Under the New Owner Policy, any violations originating with the previous owner and discovered and corrected by Range, will typically receive 100% penalty mitigation. This has allowed us to put what would have otherwise been penalty funds into productive investments in emission controls in the field.

### **Draft Attendee List**

First	Last	Title	Organization	Email
Michael	Arch	Director of Environmental Compliance	Range Resources Corporation	
Bruce	Baizel	Energy Program Director	Earthworks	
Cindy	Beeler	Oil & Gas Air Technical Advisor	U.S. EPA/Region 8	
Doug	Benevento	Regional Administrator	U.S. EPA/Region 8	
Lawrence	Bengal	Director	Arkansas Oil and Gas Commission	
Tracee	Bentley	Executive Director of the Colorado Petroleum Council	American Petroleum Institute	
Paul	Billings	National Senior Vice President, Advocacy	American Lung Association	
Suzanne	Bohan	Assistant Regional Administrator	U.S. EPA/Region 8	
Craig	Butler	Director	Ohio Environmental Protection Agency	
Andrew	Casper	Director of Legal & Regulatory Affairs	Colorado Oil and Gas Association	
Apple	Chapman	Deputy Director, Air Enforcement Division	U.S. EPA/Office of Enforcement and Compliance Assurance	
Ρ	Collins	Senior Director of Regulatory Affairs	Occidental Petroleum Corp	
	Cooper	Director of Corporate Environment	Anadarko Petroleum Corporation	
Dawn	Coughlin	Senior Advior, Regulatory and Environmental Affairs	Hess Corporation	
David	Cozzie	Group Leader for Fuels and Incineration	U.S. EPA/Office of Air and Radiation	
Jackie	Easley	Program Analyst	U.S. EPA/Region 8	
Warren	Emmerson	Manager Health, Safety, Environment & Regulatory L48	ConocoPhillips	
Kate	Fay	Environmental and Regulatory Policy Manager	Noble Energy	
ree	Forsgren	Deputy Assistant Administrator	U.S. EPA/Office of Water	
Lee	Fuller	Executive Vice President	Independent Petroleum Association of America	
Megan	Garvey	Manager	QEP Resources	

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North Dakota Department of Health	Environmental Defense Fund	Colorado Oil and Gas Association	Southwestern Energy Company	Alaska Office of the Governor	GPA Midstream	Kinder Morgan Natural Gas Pipelines	U.S. EPA/Region 6	Continental Resources, Inc.	U.S. EPA/Office of Congressional and Intergovernmental Relations	Colorado Department of Public Health and Environment	U.S. EPA/Region 6	Colorado Oil and Gas Conservation Commission	U.S. EPA/Office of Policy	MHA Nation	California Department of Pesticide Regulation	Anadarko Petroleum Corporation	Clean Air Task Force	Chesapeake Energy Corporation	New Mexico Energy Minerals and Natural Resources Department	U.S. EPA/Office of Enforcement and Compliance Assurance	North Dakota Petroleum Council
Section Chief	Senior Director of State Programs, Climate and Energy Program	President and Chief Executive Officer	Vice President, Strategic Solutions	Senior Advisor, Chief Oil and Gas Advisor	VP Government Affairs	Environment, Health and Safety Vice President	Regional Administrator	Director of Regulatory Affairs	Senior Policy Advisor for Unconventional Oil and Natural Gas	Oil and Gas Liaison	Energy Advisor	Director	Senior Advisor for Policy and Strategic Communications	Senior Environmental Scientist	Chief Deputy Director	Vice President, Health Safety and Environment	Senior Scientist	Senior Engineering Advisor - Chemicals/Water	Secretary	Acting Chief, Air Branch	President
Glatt	Grossman	Haley	Hartstein	Hendrix	Hite	Hutchins	lespl	Kelley	Kenney	Kuster	Lawrence	Lepore	Letendre	Lone Fight	Marks	McBride	McCabe	McCurdy	McQueen	Mia	Ness
L. David	Dan	Dan	Roy	John	Matthew	Thomas	Anne	J. Roger	James	Kent	Rob	Matt	Daisy	Lisa	Teresa	David	David	Rick	Ken	Marcia	မွ် 17

John	Noel	National Oil and Gas Programs Director	Clean Water Action
Arleen	O'Donnell	Vice-President	Eastern Research Group
Patrick	Padilla	Deputy Director	New Mexico Oil and Natural Gas Association
Mike	Paque	Executive Director	Ground Water Protection Council
Todd	Parfitt	Director	Wyoming Department of Environmental Quality
Lia	Parisien	Executive Project Manager	Environmental Council of the States
Karen	Pratt	Senior Environmental & Regulatory Advisor	XTO Energy
Cathy	Reheis-Boyd	d President	Western States Petroleum Association
Chris	Rimkus	Managing Counsel	MarkWest
Martha	Rudolph	Director of Environmental Programs	Colorado Department of Public Health and Environment
Adrienne	Sandoval	Federal Regulatory Issues Specialist	Andeavor
Jagadeesan	n Sethuraman	n Environmental Manager	Whiting Petroleum Corporation/ Colorado Petroleum Association
Kathleen	Sgamma	President	Western Energy Alliance
Keith	Sheedy	Technical Advisor Office of Air	Texas Commission on Environmental Quality
Fred	Shimp	Assistant Director	Ohio Department of Natural Resources
Rick	Simmers	Chief, Division of Oil & Gas Resources Management	Ohio Department of Natural Resources
Tony	Small	Vice Chairman	Ute Tribal Business Committee
Mike	Smith	Executive Director	Interstate Oil and Gas Compact Commission
Ryan	Steadley	Executive Director	STRONGER, Inc.
Ryan	Streams	Manager of Regulatory Affairs	Western Energy Alliance
Michael	Teague	Secretary - Energy & Environment	State of Oklahoma
<u>ŏ</u> ≅ 18	Tew	State Geologist of Alabama/ Oil and Gas Supervisor	State Geological Survey of Alabama/ State Oil and Gas Board of Alabama

Scott	Thompson	Executive Director	Oklahoma Department of Environmental Quality
Patrick	Traylor	Deputy Assistant Administrator	U.S. EPA/Office of Enforcement and Compliance Assurance
Ken	Wagner	Senior Advisor to the Administrator For Regional and State Affairs U.S. EPA/Office of the Administator	U.S. EPA/Office of the Administator
Zachary	Weis	Government and Community Relations Manager	Marathon Oil
Brian	Woodard	Director – Regulatory Affairs	Chesapeake Energy Corporation
Clint	Woods	Deputy Assistant Administrator	U.S. EPA/Office of Air and Radiation
Davitt	Woodwell	CEO	Pennsylvania Environmental Council
Ronald	Wopsoch	Councilman	Ute Tribe Business Committee
Lori	Wrotenbery	Wrotenbery Director, Oil and Gas Division	Railroad Commission of Texas